Introduction
The School of Dentistry (SoD) is a unique environment among the schools at UNC because its students see patients and work directly with patient data. To keep the school’s sensitive data secure, the School of Dentistry will require specific computers for predoctoral dental students and advanced education and graduate students, and will require security measures for the computers and any electronic storage media the students use. Students will be able to choose from among a number of devices identified by the Office of Computing and Information Systems as meeting security and hardware requirements.

Purpose of Policy
This policy is created to establish guidelines allowing predoctoral dental students and advanced education and graduate students in programs with a laptop requirement or a requirement to travel with sensitive data to choose computers and electronic storage media that can safely process and store sensitive data.

Audience
This policy applies to all predoctoral dental students and advanced education and graduate students required to use laptops and/or electronic storage media.

Definitions
Electronic Storage Media – Any electronic device that can be used to store data. This includes but is not limited to external hard drives and USB flash drives.

Encryption – The process of transforming information using an algorithm to make it unreadable to anyone except those possessing special knowledge, usually referred to as a “key.”

Laptop Computer – A laptop or notebook computer is a portable personal computer, usually with a clamshell form factor, suitable for mobile use, which functions using a standard operating system (i.e. Windows or the Apple OS). A laptop combines the components and inputs of a desktop computer, including display, speakers, keyboard and pointing device into a single device.

Sensitive Information – All data in original or duplicate form which contains:

- HIPAA data (including PHI and PII)
- FERPA data
- Employer tax ID numbers
- Driver’s License numbers
- Passport numbers
- Social Security Numbers
- State Identification Card numbers
- Credit/Debit card numbers
- Banking account numbers
- PIN codes
- Digital signatures
UNC-CH School of Dentistry Policy
Choose Your Own Device

- Biometric Data
- Fingertips
- Passwords
- Any other numbers or information that can be used to access a person’s financial resources

Policy

Policy Statement
All laptops and external storage media belonging to predoctoral dental students and advanced education and graduate students in programs with a laptop requirement or a requirement to travel with sensitive data will be able to securely store sensitive data because of technical requirements and controls enacted by OCIS.

1. Students in programs requiring a laptop will choose a computer from models selected by OCIS. OCIS may require a specific computer for some programs. The laptop will be subject to security requirements defined by OCIS, including encryption and other controls.
2. Students in programs with a laptop requirement or a requirement to travel with sensitive data will purchase an encrypted USB flash drive and, if needed, an encrypted external hard drive from among models selected by OCIS.
3. Programs that do not require a laptop or the need for students to travel with sensitive data will have their students sign an OCIS-provided attestation acknowledging they will not use a personal laptop, external storage, tablet, cell phone or any other mobile electronic device to directly access or store sensitive data.

Compliance

Compliance Statement
Students who fail to comply with this policy may be barred from accessing SoD resources, referred to the Honor Court system, or other disciplinary actions including, but not limited to, probation and dismissal.

Roles and Responsibilities

OCIS will:
1. Identify laptop models for students to choose from.
2. Identify USB flash drives for students to choose from.
3. Identify external hard drive models for students to choose from.
4. Ensure patching and antivirus protection of the students’ laptops, and other security safeguards as needed.
5. Document and inventory the laptops, USB flash drives and external hard drives used by students and verify compliance to this policy.
6. Provide an attestation for students to sign to show compliance with this policy.
UNC-CH School of Dentistry Policy
Choose Your Own Device

Students will:

1. Purchase one of the laptops identified by OCIS.
2. Purchase an encrypted USB flash drive identified by OCIS.
3. If needed, purchase an external hard drive identified by OCIS.
4. Only store sensitive information on the computer or storage approved, inventoried and recorded by OCIS. This includes but is not limited to tablets, cell phones or any other mobile electronic device.
5. Submit their laptops, USB flash drives and external USB drives for inspection and inventory when requested by OCIS.
6. Sign an OCIS-provided attestation documenting their compliance with this policy.

Related Data

Statutes

1. Public Law 104-192: Health Information Portability and Accountability Act (HIPAA)
2. 45 CFR Parts 160, 162 & 164 – HIPAA Privacy Act
3. North Carolina State Law §130A-12 – Confidentiality of Medical Records

Policies

1. University of North Carolina Administrative Policy on Privacy of Electronic Information
2. UNC-CH ITS Information Security Policy
3. UNC-CH ITS Security Liaison Policy
4. UNC-CH ITS Transmission of Protected Health Information and Personal Identifying-Information Policy
5. UNC-CH SoD Policy – Secure Data
6. UNC-CH SoD Policy – Incident Management
7. UNC-CH SoD Policy – Encryption

Contacts

Questions
David B. Rankin, IT Director SoD, Security Liaison SoD 919-537-3485

Violations
David B. Rankin, IT Director SoD, Security Liaison SoD 919-537-3485

Consulting
OCIS Staff, 919-537-3485
UNC Help Desk, 919-962-4357
UNC Information Security Office, 919-445-9393

History

<table>
<thead>
<tr>
<th>Version</th>
<th>Effective Date</th>
<th>Author</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Feb. 25, 2016</td>
<td>GDM</td>
</tr>
</tbody>
</table>

Approved on: 02/25/2016
UNC-CH School of Dentistry Policy
Choose Your Own Device

Next Review Date
Feb. 25, 2017

Authorization
Jane A. Weintraub, Dean, UNC School of Dentistry
Signature
Date

Approved on: 02/25/2016